IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

WILLIAM G. LETT; MARIA LETT,

Plaintiffs,

Civil Action No. 3:14-cv-00860-B

v.

CROWN CORK & SEAL COMPANY, INC.; GUARD-LINE, INC.,

Defendants.

JOINT STATUS REPORT

On April 18, 2014, this Court requested that the parties submit a joint status report advising the Court of their views on whether the following three cases should be consolidated: Lett, et al. v. Crown Cork & Seal Company, et al., Case No. 3:14-cv-860-B, Lusk v. Crown Cork & Seal Company, Inc., et al., Case No. 3:14-cv-0861-B, and White v. Crown Cork & Seal Company, Inc., et al., Case No. 3:14-cv-0862-B.

The parties believe that it would be most efficient for this Court to consolidate the cases solely for purposes of the currently scheduled summary judgment briefing. This anticipated summary judgment briefing is likely to primarily involve common questions of law, so consolidation would be appropriate. If this Court orders consolidation, the parties will file only one motion for summary judgment for all three cases (and, consequently, only one response and one reply).

DATED: April 23, 2014

Respectfully submitted,

WATERS & KRAUS, LLP

/s/ Kyle G. Cole

KYLA G. COLE State Bar No. 24033113 kcole@waterskraus.com SYMONE REDWINE State Bar No. 24083713

3219 McKinney Avenue Suite 3000 Dallas, Texas 75204 (214) 357-6244 (214) 357-7252 Fax

ATTORNEYS FOR PLAINTIFFS

/s/ James C. Ho

James C. Ho State Bar No. 24052766 Prerak Shah State Bar No. 24075053 GIBSON, DUNN & CRUTCHER LLP 2100 McKinney Avenue, Suite 1100 Dallas, TX 75201-6912

Tel.: (214) 698-3264 Fax: (214) 571-2917 jho@gibsondunn.com pshah@gibsondunn.com

COUNSEL FOR DEFENDANT CROWN CORK & SEAL COMPANY, INC.

/s/ Nathan A. Bosio

NATHAN A. BOSIO State Bar No. 24061238 nbosio@dwwattorneys.com Dogan & Wilkinson, PLLC 734 Delmas Avenue (39567) P. O. Box 1618 Pascagoula MS 39568-1618

Tel: (228) 762-2272 Fax: (228) 762-3223

COUNSEL FOR DEFENDANT GUARD-LINE, INC.